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January 21, 2022

Via CM/ECF Electronic Filing

Hon. Jessica S. Allen, U.S.M.J.
United States District Court
District of New Jersey - Newark Vicinage
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Ortiz, Katrina, et al. v. Twp. of Woodbridge, et al.
Civil Action No. 2:19-CV-14139
DOL No. 19-01805

**Request for Extension of State Defendants' Deadline to
File a Reply Brief to January 25, 2022**

Dear Judge Allen,

This office represents the Defendants, State of New Jersey, Christine Norbut Beyer, MSW, Keisha Ridly, Jacqueline Cardona, Haydee Zamora-Dalton, and Carmen Diaz-Petti, ("State Defendants"), in the above-captioned matter. State Defendants filed a Motion to Dismiss Plaintiffs' Third Amended Complaint with prejudice pursuant to Fed. R. Civ. P. 12(b)(6) on December 17, 2021 in the above matter. (ECF No. 68). The Motion to Dismiss was originally marked returnable on January 18, 2022, making Plaintiffs' Opposition due on January 4, 2022, and State Defendants' Reply due on January 11, 2022. See Id.

However, on December 21, 2021, Plaintiffs filed a letter with the court, requesting a two-week extension of time, from January 4, 2022 to January 18, 2022, to file their Opposition to State Defendants' Motion to Dismiss, which the court granted by the way



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of a Letter Order entered on the same date.¹ (ECF Nos. 70 & 71). Plaintiffs filed their Opposition to State Defendants' Motion to Dismiss on January 18, 2022, pursuant to the court's December 21, 2021 Letter Order. (ECF No. 72).

In light of the above, State Defendants are writing to respectfully request a similar extension of their deadline to file a Reply Brief, from January 11, 2022 to January 25, 2022. As Plaintiffs' Opposition was filed on January 18, 2022, granting State Defendants' request to file their Reply Brief by January 25, 2022, would provide Defendants with the requisite seven (7) days to file their Reply under L. Civ. R. 7.1(d)(3). See L. Civ. R. 7.1(d)(3).

Thus, State Defendants respectfully request that the court grant their request for a similar two-week extension of the deadline to file their Reply Brief, from January 11, 2022 to **January 25, 2022**.

If the court has any questions or concerns, I can be reached at (609) 815-2962.

Thank you for your courtesies.

Respectfully submitted,

ANDREW J. BRUCK
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Ashley L. Costello
Ashley L. Costello (107192015)
Deputy Attorney General

AC

cc: All Counsel of Record

Via - CM/ECF e-Filing

¹ Plaintiffs' December 21, 2021 letter did not request a similar two-week extension of the deadline for State Defendants to file their Reply Brief. (See Dkt. 70).